

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HUAWEI TECHNOLOGIES CO. LTD.,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.,
et al.

Defendants.

No. 2:20-cv-030-JRG

Jury Trial Demanded

VERIZON BUSINESS NETWORK
SERVICES, INC., et al.

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO. LTD.,
et al.

Counterclaim-Defendants.

**HUAWEI'S UNOPPOSED MOTION FOR LEAVE TO
AMEND ITS INVALIDITY CONTENTIONS**

Plaintiffs and Counterclaim-Defendants Huawei Technologies Co., Ltd., Huawei Technologies U.S.A., Inc. and Futurewei Technologies Inc. (collectively, "Huawei") respectfully move the Court for leave to amend their invalidity contentions for good cause under Local Patent Rule 3-6(b). Huawei seeks to amend the original June 29, 2020 Invalidity Contentions in response to corrections Verizon made to its infringement contentions. These amendments provide similar corrected cross references to match Verizon's current infringement contentions. Good cause exists at least because the amendments are minor in nature, and Huawei diligently

sought leave to amend its contentions after confirming that Verizon is not opposed to these proposed amendments as reflected in the redlined copies of Huawei's amended Invalidity Contentions attached hereto as Exhibits A1 – A17, B1-B17, C1 and C2.

Counterclaim-Plaintiffs Verizon Business Network Services Inc., Cellco Partnership d/b/a Verizon Wireless, Verizon Data Services LLC, Verizon Business Global LLC, Verizon Services Corp., and Verizon Patent and Licensing, Inc. do not oppose this motion.

For the foregoing reasons, Huawei respectfully requests that the Court grant its Motion for Leave to Amend its P.R. 3-2 Invalidity Contentions as set forth in Exhibits A1 – A17, B1-B17, C1 and C2.

Dated: November 11, 2020

Respectfully submitted,

/s/ Bradley W. Caldwell

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COUNTERCLAIM DEFENDANT HUAWEI

TECHNOLOGIES CO., LTD. AND

COUNTERCLAIM DEFENDANTS HUAWEI

TECHNOLOGIES USA, INC. AND

FUTUREWEI TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on November 11, 2020. Local Rule CV-5(a)(3)(A).

/s/ Bradley W. Caldwell

Bradley W. Caldwell